



The Planning Inspectorate
Yr Arolygiaeth Gynllunio

Norfolk Boreas

(EN010087)

Correspondence received after the
close of the Examination at 23:59 on 12 October
2020

No.	From	Organisation	To	Date Received
1	Mary Ralph	Necton Farms	The Planning Inspectorate	26 October 2020
2	Vicki James	Whale and Dolphin Conservation	The Planning Inspectorate	03 December 2020
3	Anne Phillips	Mulbarton Parish Council	The Planning Inspectorate	02 January 2021
4	Martin Kerby	Natural England	Department for Business, Energy and Industrial Strategy (BEIS)	30 April 2021
5		Necton Parish Council	Department for Business, Energy and Industrial Strategy (BEIS)	08 December 2021

From: Mary Ralph [REDACTED]
Sent: 26 October 2020 10:06
To: NI Enquiries <NIEnquiries@planninginspectorate.gov.uk>
Subject: Norfolk Boreas

Dear Sirs

Whilst this examination period has expired, I write to merely confirm that, I, acting on behalf of Necton Farms (as quoted in the applicants response at deadline 16, ref R17.1.1) can confirm agreement to the applicant's response, and can confirm that negotiations are ongoing, certainly with intent for an agreement prior to the outcome of the DCO application. Please confirm receipt and acceptance of this response. Thank you.

Mary Ralph, MRICS FAAV
Land Agent, Divisional Partner



For full details of all our services, please visit our [Website](#)

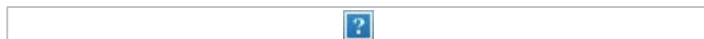
For and on behalf of Brown & Co - Property & Business Consultants LLP

T 01553 778066 [REDACTED] **F** 01553 770331 

King's Lynn Office, Market Chambers, 25-26 Tuesday Market Place, King's Lynn, Norfolk, PE30 1JJ, United Kingdom

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DPC:76616c646f72



From: [Vicki James](#)
To: [Norfolk Boreas](#)
Subject: Norfolk Boreas WDC Final SoCG
Date: 03 December 2020 10:23:11
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

Dear Sir /Madam,

I am emailing regarding the SoCG between Whale and Dolphins Conservation and Norfolk Boreas Ltd, regarding the application for Norfolk Boreas offshore wind farm.

I apologise that you did not receive by the deadline, confirmation from WDC that the SoCG sent by the applicant reflects our final position. [REDACTED] have only returned to work in the past few weeks. I am still catching up with everything from the last few months.

I have been in contact with the applicant for Norfolk Boreas to pass my apologies onto them. I also wish to confirm with you that the SoCG the applicant submitted at Deadline 9 was an accurate reflection of the final positions reached between us.

If there are any outstanding issues or questions for WDC regarding the developments, please let me know.

Best wishes

Vicki

Vicki James

Policy officer

Stop Whaling

Telephone: +44 (0)1249 449 500

WDC, Whale and Dolphin Conservation
Brookfield House
38 St Paul Street
Chippenham
Wiltshire
SN15 1LJ
United Kingdom
whales.org

[WDC - Protecting Whales and Dolphins for over 30 years](#)



Whale and Dolphin Conservation ("WDC") is a company registered in England and Wales (No. 02737421) and a registered charity (in England and Wales No. 1014705, in Scotland No. SC040231)

WDC Shop is a trading name of **WDC (Trading) Ltd**, a company registered in England and Wales (No. 02593116)

Registered office : Brookfield House, 38 St. Paul Street, Chippenham, Wiltshire, SN15 1LJ. Tel: +44 (0)1249 449 500

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From: [Mulbarton Parish](#)
To: [Norfolk Boreas](#)
Subject: EN010087 Norfolk Boreas
Date: 02 January 2021 16:08:04
Attachments: [Outlook-oily411n.png](#)
[MPC Norfolk Boreas 2nd January 2020 \(1\).pdf](#)

Good afternoon,

Please find attached a submission from Mulbarton Parish Council setting out further cumulative effects in South Norfolk which would flow from the Norfolk Boreas project as currently proposed.

Whilst we appreciate the examination closed on 12th October 2020, we would be pleased if you would kindly acknowledge safe receipt.

Kind regards
Anne

Anne Phillips
Clerk, Mulbarton Parish Council
Parish Office, The Common, Mulbarton, NR14 8AE
01508 578134 / www.mulbartonpc.org.uk

*Please note: the Parish Office is only open part time.
Emails will be checked twice a week.*



Mulbarton Parish Council
The Common
Mulbarton
NR14 8AE

11th December 2020

The Rt. Hon. Alok Sharma MP
Secretary of State for Business,
Energy and Industrial Strategy

Dear Mr Sharma,

Hornsea Project Three

We wrote to you on 25th May this year to express our very serious concern about this project. On 5th June we received a reply, sent on your behalf [REDACTED] explaining that an 'urgent review' was under way. A second letter on 15th June 2020 drew your attention to the importance of integrated offshore transmission in achieving the government's increased renewable energy targets.

Shortly afterwards, on 1st July 2020, your department issued a 'minded to approve' letter proposing to grant approval of the Hornsea Three application on 31st December 2020, subject only to a further consideration of offshore ecology. This was also the first time that local communities were able to see the Examining Authority's report of 1st July 2019 and the department's response.

Since then, in addition to the government's own urgent review, National Grid has begun a further consultation on integrated offshore transmission. These reviews will not be completed this year.

Now that we have seen both the Examining Authority's report, and the 'minded to approve' letter, and taking into account the offshore transmission reviews, we strongly urge that this application should not be approved at this time. The reasons for this are set out in more detail overleaf.

Kind regards,

Anne Phillips
Parish Clerk

On behalf of Mulbarton Parish Council

cc: Mr Richard Bacon, MP
South Norfolk

Mr. Gareth Leigh
Head of Energy Infrastructure Planning
Dept. for Business, Energy and Industrial Strategy

Mr. David Claydon
Enquiry Unit Advisor
Dept. for Business, Energy and Industrial Strategy

1. Grid connections

The purpose of the IOTP (East) feasibility study of 2015 was to find the most efficient method of connecting East Coast Round 3 projects to the grid with the maximum transfer of renewable energy, savings for the consumer, and minimum infrastructure. The report and its appendices were issued in August 2015 on the basis of a grid connection for Hornsea Three at Walpole, as shown in Figure 1.

In July 2016 the applicant requested a change of grid connection, and an offer at Dunston was accepted in October. The Statement of Community Consultation was issued in September 2016.

The IOTP (East) feasibility study report was not submitted into the Hornsea Three examination, but it was submitted to the Norfolk Vanguard examination in May 2019, shortly after the Hornsea Three examination had ended on 2nd April 2019. In the case of Norfolk Boreas, it was submitted by the applicant and accepted by the Examining Authority as recently as February of this year.

The ‘minded to approve’ letter for Hornsea Three states that the Secretary of State is content with the Examining Authority’s consideration of grid connection issues for Hornsea Three. If the report of the IOTP (East) feasibility study had been submitted, the outcome may have been very different.

The Electricity Act of 1989 called for transmission systems to be efficient, co-ordinated and economical; to facilitate competition in the supply and generation of electricity; and to take account of the effect on the physical environment. All of these aspects are clearly important to meeting the government’s ambition to bring higher levels of offshore wind into the onshore transmission grid. The proposed scheme of connection, shown in Figure 2, hardly seems to satisfy that expectation.

2. Cumulative effects

The existing Dudgeon and Sheringham Shoal offshore wind farms are connected at Necton and Salle, and their Round 2 Extension projects, known as DEP & SEP, could simply connect at Necton.

The assignment of capacity at Necton for Norfolk Vanguard and Boreas seems to have displaced grid connections for both Hornsea Three and DEP & SEP to Dunston, but the offer of a connection for DEP & SEP was not made until April 2019, just a few days after the Hornsea Three examination had ended on 2nd April 2019. The offer was accepted almost immediately, in May 2019.

It is now apparent that if DEP & SEP is connected at Dunston, this will disrupt use of the B1113 into Norwich for a prolonged period, coinciding with the doubling of heavy goods vehicle traffic for construction of the Hornsea Three substation. This will prompt the diversion of the morning peak commuter traffic onto country lanes. A large industrial zone will be created in open countryside, as shown in Figure 3. These cumulative effects were not identified in the Hornsea Three examination.

3. Siting of the Hornsea Three onshore substation

The methodology set out in the Scoping Report of October 2016 whereby environmental impacts would be minimised does not seem to have been followed at the onshore substation. The first public consultation suggested that a low-lying site close to the grid connection point would be used, and the possibility of excavation to reduce overall building height within the landscape was discussed.

The opportunity to take advantage of a worked-out gravel pit with existing trunk road access was also discussed, but not taken up. Instead, the proposal submitted as part of the DCO application was to use a much more prominent site, within a landscape protection zone, on rising ground and clearly visible over a wide area, and with all construction traffic diverted onto local minor roads. This led the local planning authority to oppose the use of HVDC transmission for the export cable route.

The Examining Authority’s report described the gravel pit as a quarry with plans for expansion, even though evidence had been provided showing when gravel extraction was due to end, and that the local authority had removed the planned areas of expansion from its published documentation.

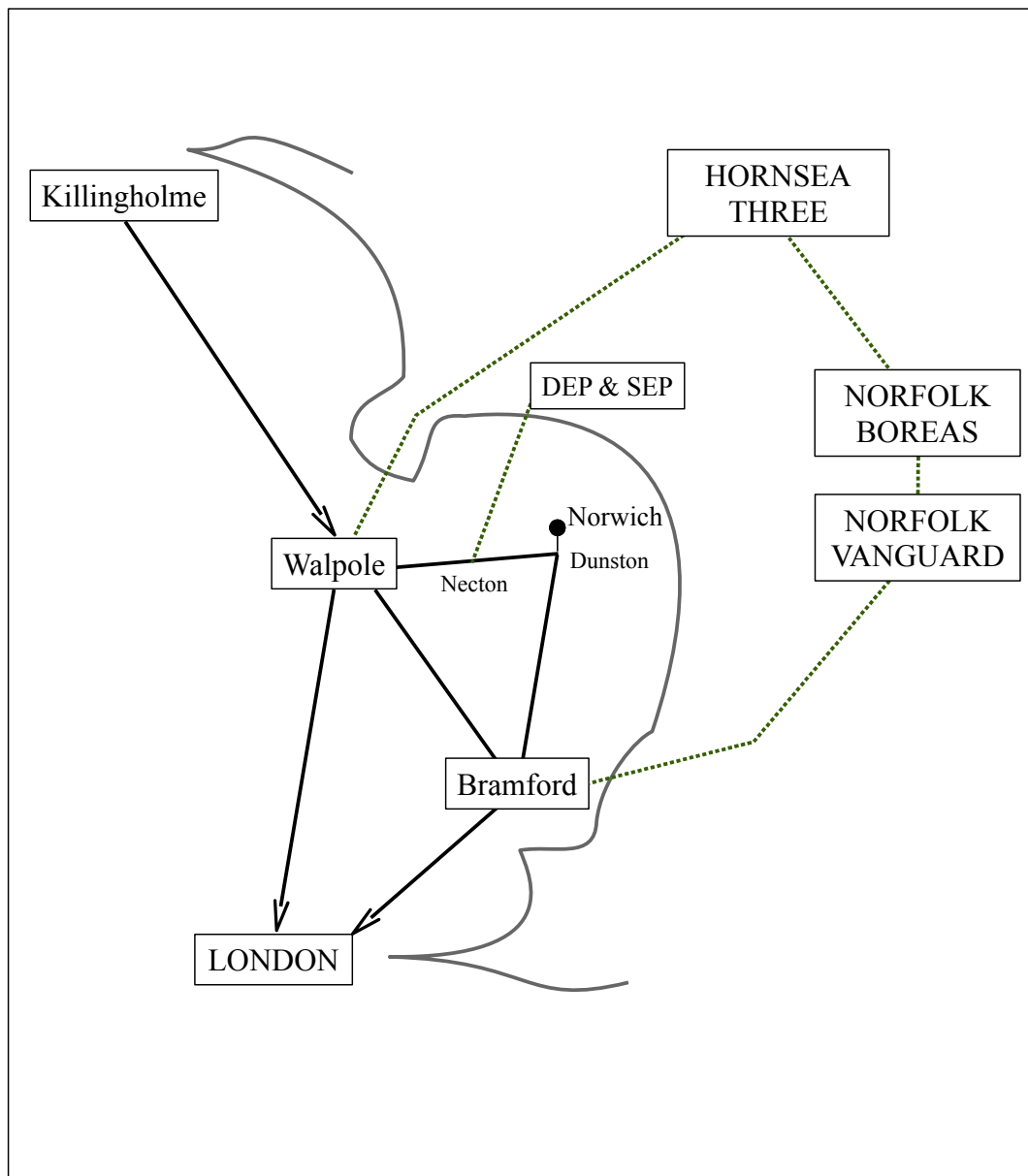


Figure 1

Integrated offshore transmission

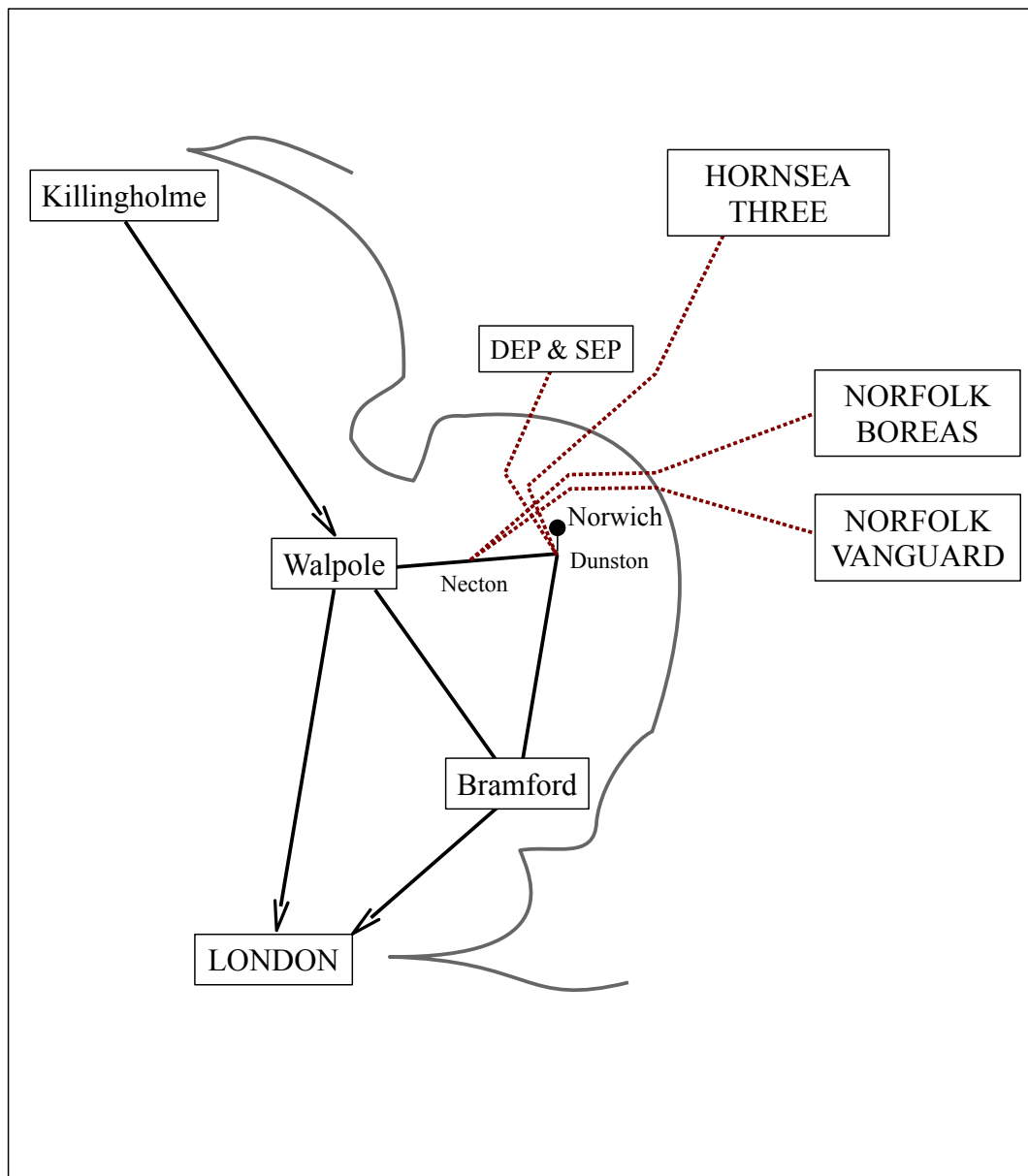


Figure 2

Point-to-point links

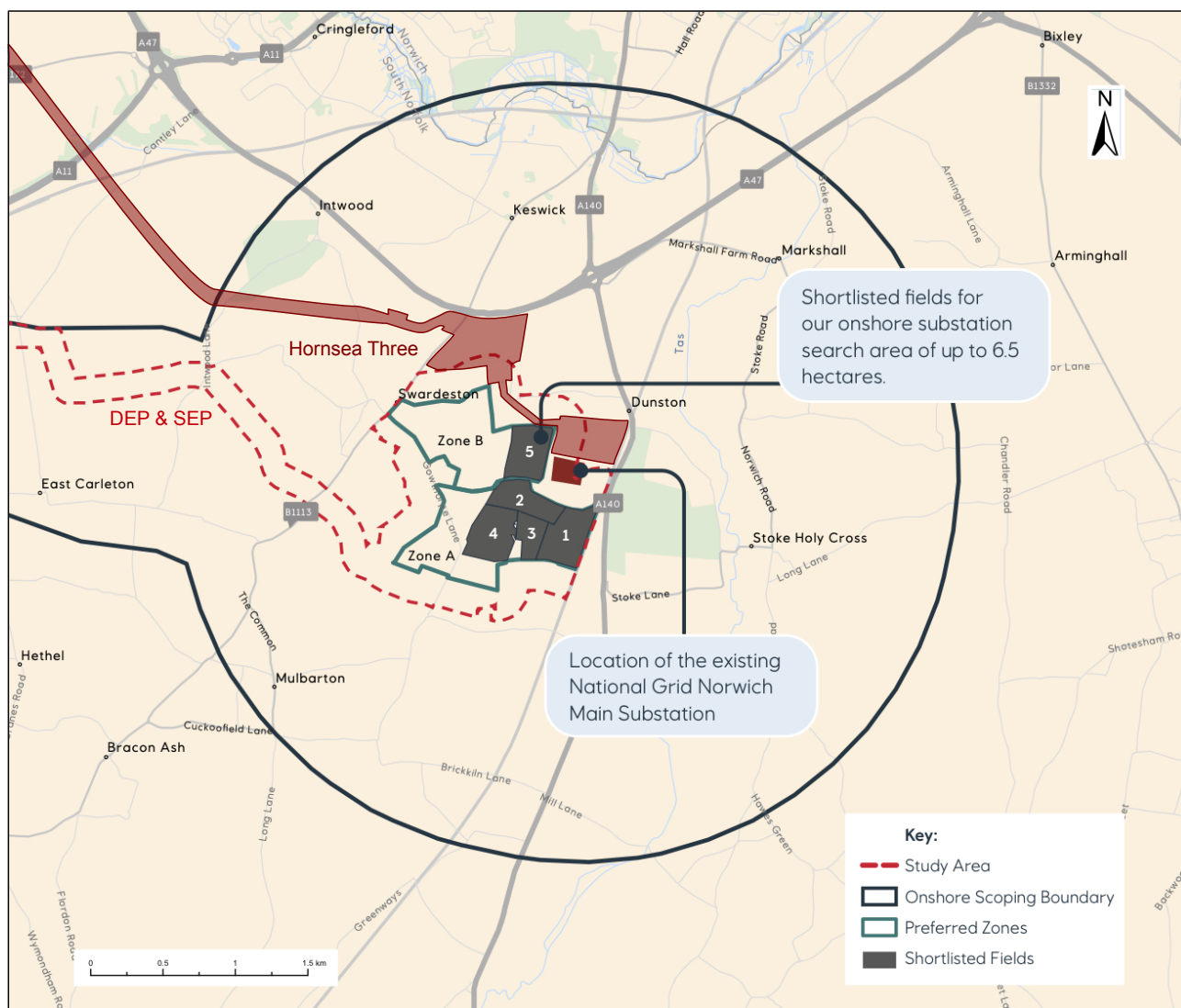


Figure 3

Hornsea Three with Dudgeon and Sheringham Shoal Extensions

The Scoping Report for the Dudgeon and Sheringham Shoal Extensions was issued in October 2019.

This diagram is reproduced from the Community Consultation Leaflet published by Equinor in July 2020, with the Hornsea Three details added.

Date: 30 April 2021
Our ref:
Your ref: EN010087



Department for Business, Energy and Industry Strategy
1 Victoria Street
London
SW1H 0ET

BY EMAIL ONLY

Dear Mr Leigh

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by Norfolk Boreas Limited ("the Applicant") for an Order granting Development Consent for the proposed Norfolk Boreas Offshore Wind Farm and associated offshore and onshore infrastructure ("the Norfolk Boreas project")

REQUEST FOR INFORMATION

Thank you for your letter dated 28 April 2021 regarding the above.

Natural England considers the proposed deadline of 23.59 on Friday 28 May 2021 does not provide sufficient time to produce the necessary information requested in the letter, should that information require consultation with Natural England. This is for the following reasons:

1. The development of compensatory measures in the offshore environment is both challenging and legally precedent setting, and it is likely that several discussions and iterations of the requested information will be required before sufficiently detailed and robust proposals are brought forward. We do not consider that this can be achieved for multiple receptors in the timescales identified. Furthermore, a longer timescale would give greater scope for the involvement of other interested parties (e.g. Wildlife Trust, RSPB) should that be desired.
2. The latest project parameters and baseline ornithology survey data for Hornsea Project Three Offshore Wind Farm (OWF) are not held by Natural England and it is unclear when these will be made available. Following their receipt, these would need careful analysis by Natural England specialists before the Applicant could incorporate these into any cumulative/in-combination impact assessments. Once this is done, this information will clarify the level of cumulative impact on those Flamborough and Filey Coast SPA receptors where an adverse effect on integrity (AOEI) cannot be excluded when impacts from Hornsea Project Three are included in the assessment. These are gannet, razorbill and guillemot. Allowing a longer response period that incorporates full review of any information provided by Hornsea Project Three will give greater clarity on the requirement for, and scale of, the in-principle compensatory measures for these species, which is another one of your requests for information.
3. As you will know, the Examinations into East Anglia One North and East Anglia Two OWF have been extended until 6th July 2021, meaning that resources for a number of North Sea stakeholders, including those of Natural England, are already stretched. During this time Natural England will also be heavily involved in providing advice regarding several other OWF developments, including Dudgeon & Sheringham Extension (Section 42 consultation), Hornsea Project Three (Kittiwake and Benthic

Compensation Steering Groups) and Hornsea Project Four (Evidence Plan process, including in-combination discussions).

We are committed to engaging constructively with Norfolk Boreas to deliver the information requested; however, to do so effectively we consider further time is needed.

4. A number of issues raised in your letter are also highly relevant to the East Anglia One North and East Anglia Two cases, including the potential for development of strategic compensation options between SPR and Vattenfall for their respective projects. These strategic measures are likely to be considered through the extended examination for East Anglia 1N and East Anglia 2 which are due to conclude on 6th July 2021. Therefore, it would facilitate the consenting process for all these projects if it can be shown the overall set of compensatory measures proposed by the projects are compatible and feasible, and that any opportunities to progress strategic compensation measures are fully explored.

5. We note that previous requests from the Secretary of State (SoS) in similar matters have been for significantly longer periods e.g. four months for Hornsea Project Three and Norfolk Vanguard. Whilst we fully recognise the urgency of bringing forward renewable energy developments, we are concerned that such a significant reduction in the amount of time provided will not allow the significant number of outstanding issues to be resolved.

We therefore request that the SoS consider whether the current deadline will allow the above issues to be satisfactorily addressed and thereby ensure the information submitted will meet the SoS's requirements. It would seem appropriate to provide a further 4 – 6 weeks to achieve this.

For any queries relating to the content of this letter please contact me using the details provided below or my colleague Louise Burton, [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk).

Yours sincerely

Martin Kerby
Principal Adviser Offshore Wind
E-mail: [REDACTED] [@naturalengland.org.uk](mailto:[REDACTED]@naturalengland.org.uk)
Telephone: [REDACTED]

Necton Parish Council

Parish Office, Necton Community Centre
13 Tun's Road, Necton. Norfolk. PE37 8EH



The Rt. Hon. Kwasi Kwarteng
Secretary of State
The Department for Business, Energy and Industrial
Strategy

nectonparishcouncil@gmail.com
Tel: 01760 721665

8th December 2021

Dear Mr. Kwarteng,

Re: The re-determination of the DCO for the Norfolk Vanguard Boreas offshore wind farm and the determination of the DCO for Boreas offshore wind farm

Necton Parish Council are aware that the deadline for input into the decision on the Vanguard and Boreas DCOs has passed but ask that this submission be taken into account because the progress of offshore wind implementation is moving at a fast pace and new information is continuously becoming available.

Orsted, did not include battery storage in their Hornsea 3 DCO and so this was not scrutinised by the ExA and not considered by the Secretary of State when awarding consent for the project.

The subsequent application under "permitted development" to South Norfolk Council seems to us to be a slight of hand to avoid due process of a critical part of the overall strategy for Offshore Wind Energy.

Necton Parish Council accept it is a logical to use batteries to balance supply and demand especially with such a variable resource as wind generation. In fact, so logical it is obvious and we think could have been foreseen by the Applicant and therefore should have been included in the DCO

Naturally Necton Parish Council are concerned with the probability that Vattenfall will also require battery storage facilities at the Vanguard and Boreas Substation sites very close to the village of Necton. We suspect that they will use the same back door approach as there was no mention of battery storage in either DCO application for Vanguard or Boreas. Surely the inclusion of a very large number of these containerised storage units should have been and **must now** be included in the proper assessment of the cumulative impact of the combined projects Boreas and Vanguard which the Secretary of State is due to determine/re-determine shortly.

The Secretary of State for BEIS will be aware that there have been numerous fires associated with the proposed Li ION battery technology some very serious *see article in the Eastern Daily Press*

[REDACTED]

Website: www.nectonparishcouncil.norfolkparishes.gov.uk

Necton Parish Council is the sole Trustee of Necton Rural Community Centre.
Registered Charity No: 304016.



In the event of a fire large amounts of water would be required to cool adjacent units to prevent an uncontrolled chain reaction. This water will be contaminated with Lithium etc. and likely end up in the ground potentially affecting local aquifers. If the fire did get out of control what provisions would be made to protect local residents from smoke and noxious fumes. Bearing in mind that Boreas and Vanguard are within 1.5Km of Necton what decision would the local fire brigade be told to make if the choice was between protecting a nationally important substation or a small village?

In the event of fire, as these substations are to be remotely managed, the local fire brigade would be required to attend with at present no proper training, experience or equipment to deal with a fire involving Lithium Ion and Lithium metal which are highly reactive with water and air.

Is the Secretary of State confident that adequate processes and robust regulations are in place to ensure safe implementation and operation of large battery storage facilities in combination with substations at the application stage or is he content to allow this to happen outside of his control? The successful Judicial Review of Norfolk Vanguard was based on failure to consider the cumulative impact of adjacent projects. Are we not potentially heading in the same direction here?

Of course the proposed OTN would reduce the quantity of battery storage needed overall as it would allow the power balancing to occur across many different off shore wind farms. The location of the battery storage should therefore connect direct to the Multi-Point Connectors offshore. This would enable them to be situated away from habited areas. The opportunity to become an "early adopted" or a "Pathfinder Project" for the OTN project has been repeatedly rebuffed by Vattenfall as they have chosen not to opt-in. The latest being the spokesperson for Vattenfall, Catrin Jones, on Anglia evening news report on the 2nd of December on offshore wind, who said in reference to the OTN...and I quote "the technology required for the huge amount of power is not available etc."

This appears to be a misrepresentation of the truth as Vattenfall are already constructing a similar Offshore Link *please see:* [REDACTED]

This is just another example of a systemic and cynical attempt by the Applicant to distort public opinion to justify their own agenda in the name of providing "home grown" green energy and "self-sufficiency".

To achieve the Carbon Target set at COP26 in Glasgow the UK Government requires a sound long term strategy. Short term gains by allowing radial connection to the National Grid may not be the best option in this instance as considerable cost savings with little impact on overall timescale are likely to come through the immediate adoption of the OTN. This would prevent long term harm to the UK environment and reduce the cost of future offshore wind power."

Necton Parish Council respectfully request the Secretary of State to mandate that all current and future projects must opt-in to the OTN as the true extent of the damage and dangers of the radial connections are becoming apparent. Multiple radial connections are obviously a sub-optimal route to sustainable green offshore wind energy.

Yours sincerely

Necton Parish Council